THURSTON COUNTY
WASHINGTON
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PUBLIC HEALTH & SOCIAL SERVICES DEPARTMENT

POLICY 11-200

Approved by: _____
Patrick Libbey, Director

PROTECTING CONFIDENTIALITY OF PERSONAL HEALTH INFORMATION

This policy applies when Department staff collect, document, store or release personal health information of clients[1]. "Personal health information" is defined as information in any form -- oral, electronic, or printed -- which identifies an individual and relates to his or her physical or mental health.

A) An Up-To-Date "Notice Of Privacy Practices" Is Made Available To Clients.

A printed notice of privacy practices listing all permissible disclosures of clients' personal health information is physically posted in clinic exam rooms and clinic waiting areas and made available to clients in written form. The notice is kept updated with any material change in the Department privacy practices.

B) Department Staff Give Clients Privacy When They Are Sharing Personal Health Information.

Staff provide services and conduct Department operations in such a way that only those who need to know can hear or see clients when they are giving personal health information to providers.

C) Written / Printed Documentation Of Personal Health Information Is Protected From Unauthorized Disclosure.

Staff understand and follow procedures to protect written / printed documents generated both internally and externally from unauthorized

[1] "Clients" may include employees when personal health information is involved.

disclosure. These documents include medical records, billing forms, x-ray films, lab reports, client logs, and mailed or faxed documents containing personal health information. *[See Procedure 11-200 Confidential Handling of Medical Records; Procedure 11-201 Confidential Handling of Mailed or Faxed Documents Containing Personal Health Information; Procedure 11-202 Confidential Handling of Client Billing Forms Containing Personal Health Information; Procedure 11-203 Confidential Handling of Client Logs.]*

D) Electronic Documentation Of Personal Health Information Is Protected From Unauthorized Disclosure.

Staff understand and follow procedures to protect computer systems containing personal health information, including County policies on password protection and leaving computers unattended. *[See County Policies: Electronic Information System and Communication, Information Technology Security Policy and Guidelines: User IDs and Passwords, External Network Access Standard, Remote Access Security Agreement.]*

E) Release of Personal Health Information Requires Client Authorization, A "Need To Know", and Medical Record Documentation.

Specific authorization, verified by the client's signature, must be obtained prior to release of any personal health information. Release of personal health information is on a "need to know" basis: Only such information as is necessary to accomplish treatment, payment, or other health care operations on behalf of the client is released. Documentation of what personal health information is released, as well as when and to whom it is released is required in the client's medical record.

F) The Department Ensures Protection Of Personal Health Information At Recipient Site

The Department ensures that confidentiality of our clients' released personal health information is maintained at recipient sites through memoranda of understanding or contract language that specifies compliance with confidential procedures.

G) Exceptions To This Policy Are Limited To Situations Where Washington State Law Over-Rides Personal Health Confidentiality

In certain situations -- such as communicable disease reporting, reporting suspected child abuse and neglect to Child Protective Services, or certain legal subpoenas – state law requires release of personal health information without client authorization. Staff understand and follow procedures developed to comply with these laws for release of personal health information. *[See Procedure 11-204 Handling Legally Mandated Release of Personal Health Information.]*